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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-cr-080-JCM-VCF
)	
Plaintiff,)	
)	
v.)	
)	
GREGORY ALLEN WATERS II,)	
)	
Defendant.)	
_____)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and William Carrico, Assistant Federal Public Defender, counsel for Defendant GREGORY ALLEN WATERS, II, that the date for the Government to file a response to the Defendant's Motion to Suppress Evidence (Docket #18) be extended for ten (10) days.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on May 21, 2015. A response is currently due on or before June 8, 2015. (PACER set the Government's response deadline for June 7, 2015, which fell on a Sunday.)

1 2. Undersigned counsel must conference with the involved officers in order to
2 develop the facts necessary to provide a meaningful response to the Defendant's Motion.
3 Undersigned counsel is in the process of scheduling meetings with the involved officers and will
4 need time to complete those interviews.

5 3. The Defendant's trial is presently scheduled for September 14, 2015.
6 Consequently, a brief continuance of the Government's response deadline is likely to have no
7 effect on the current trial date.

8 4. The Defendant is incarcerated, but he does not object to the continuance of the
9 Government's response deadline.

10 5. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow the parties sufficient time to receive and review the "dash cam" video recording,
12 and for the Government to have adequate time to prepare an appropriate response to the
13 Defendant's Motion.

14 6. Additionally, denial of this request for continuance could result in a miscarriage
15 of justice.

16 7. This is the first stipulation filed herein to continue the Government's response
17 deadline.

18 DATED: June 8, 2015.

19
20 /s/
21 PHILLIP N. SMITH, JR.
22 Assistant United States Attorney
Counsel for the United States

20 /s/
21 WILLIAM CARRICO
22 Assistant Federal Public Defender
Counsel for Defendant GREGORY WATERS II

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) **2:15-cr-080-JCM-VCF**
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Plaintiff,)
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GREGORY ALLEN WATERS II,)
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Defendant.)
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FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion was filed and served on May 21, 2015. A response is currently due on or before June 8, 2015. (PACER set the Government's response deadline for June 7, 2015, which fell on a Sunday.)

2. Undersigned counsel must conference with the involved officers in order to develop the facts necessary to provide a meaningful response to the Defendant's Motion. Undersigned counsel is in the process of scheduling meetings with the involved officers and will need time to complete those interviews.

3. The Defendant's trial is presently scheduled for September 14, 2015. Consequently, a brief continuance of the Government's response deadline is likely to have no effect on the current trial date.

4. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

